

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

MAUI JIM, INC., an Illinois Corporation,)	
)	
Plaintiff,)	No. 16-cv-09788
)	
)	Judge Aspen
v.)	
)	Magistrate Judge Gilbert
SMARTBUY GURU ENTERPRISES, a Cayman Island Company, MOTION GLOBAL LTD., a Hong Kong Company, SMARTBUYGLASSES SOCIETÀ A RESPONSABILITÀ LIMITATA, an Italian company, SMARTBUYGLASSES OPTICAL LIMITED, a Hong Kong company,)	
)	
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL AND FOR
LEAVE TO FILE A MEMORANDUM IN EXCESS OF 15 PAGES**

Pursuant to Local Rules 5.8, 7.1 and 26.2, Plaintiff Maui Jim hereby moves this Court for an order permitting it to file under seal Plaintiff’s Opposition to Defendants’ Motion to Compel and for up to seven additional pages for such memorandum, stating in support as follows:

1. On October 25, 2017, this Court entered an Agreed Confidentiality Order (“Confidentiality Order”) pertaining to the protection of confidential information produced in the course of discovery in this case. (Dkt. 51.)
2. Pursuant to Paragraph 5(c) of the Confidentiality Order, the parties and their counsel are prohibited from disclosing or permitting “the disclosure of any Confidential Information to any third person or entity,” excepting, among others, this Court, witnesses at depositions, and the parties’ experts.

3. Paragraph 7 of the Confidentiality Order provides that it “does not, by itself, authorize the filing of any document under seal. Any party wishing to file a document designated as Confidential Information in connection with a motion, brief, or other submission to the court must comply with LR 26.2.”

4. On June 25, 2018, Defendants moved for an order compelling Plaintiff to produce certain documents. (Dkt. 179.)

5. Defendants’ motion requests the Court to compel the disclosures of all Maui Jim’s Attorneys’ Eyes Only documents, to compel production of documents throughout the entire European Union, and to compel documents related to certain European employees.

6. In order to properly address Defendants’ arguments, Maui Jim requests up to seven pages for its response.

7. Maui Jim also seeks leave to file Plaintiff’s Opposition to Defendants’ Motion to Compel under seal, which it provisionally filed under seal, because it addresses and deals with documents and issues designated as confidential under the Confidentiality Order.

WHEREFORE, Maui Jim respectfully moves this Court to enter an order granting it leave to file Plaintiff’s Opposition to Defendants’ Motion to Compel under seal and for up to seven additional pages for such memorandum.

Respectfully Submitted,

Michelle M. Mikol (Illinois Bar No. 6290243)
BARNES & THORNBURG LLP
1717 Pennsylvania Avenue NW, Suite 500
Washington, DC 20006
(202) 371-6356
mmikol@btlaw.com

By: /s/ Michelle M. Mikol
John T. Gabrielides (Illinois Bar No. 6198323)
BARNES & THORNBURG LLP
One North Wacker Drive, Suite 4400
Chicago, IL 60606
(312) 357-1313
jgabrielides@btlaw.com

Attorneys for Plaintiff